

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

UNITED STATES OF AMERICA)	
)	
v.)	Case No. 3:19cr130
)	
OKELLO T. CHATRIE,)	
Defendant)	

**DEFENDANT'S RESPONSE TO THE GOVERNMENT'S STAUS UPDATE
REGARDING FILING SEARCH WARRANTS AT ISSUE IN THIS MATTER**

Okello Chatrie, through counsel, responds as follows to the government's status update regarding the filing of search warrants and returns at issue in this matter:

In its Status Update, the government indicated that it would file a Notice to Introduce Evidence before the February 20, 2020, hearing in this case. With that Notice, the government will provide to the Court for the Court to review prior to the hearing the raw data that Google provided to the government relating to the geofence issue. *See* ECF No. 55 at 2. Mr. Chatrie fails to comprehend why the government agrees that it should provide this data to the Court to review before the February 20, 2020, hearing but has declined to provide the Court with this data now. The defense maintains that this data is critical to the Court's understanding of the nature of the search in this case, both for purposes of the discovery hearing scheduled for January 21, 2020, as well as the suppression hearing scheduled for February 20, 2020.

Counsel for Mr. Chatrie conferred with the government and expressed their belief that the three Excel spreadsheets containing the raw data provided by Google should be filed with the Court, under seal. This information is both relevant and appropriate for the Court to consider at this stage as the Court prepares to rule on the pending geofence motions in ECF Numbers 28 and

29. Counsel believes that sealing is necessary to protect the privacy interests at stake, but sees no reason in this instance why the Court should not have access now to the same information provided to the parties.

Respectfully submitted,
OKELLO T. CHATRIE

By: _____/s/_____

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CERTIFICATE OF SERVICE

I hereby certify that on December 19, 2019, I filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to all counsel of record.

/s/

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